

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709
DANIEL J. COWHIG
Assistant United States Attorney
United States Attorney's Office
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101-6514
(702) 388-6336
daniel.cowhig@usdoj.gov
Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH GIULIANO,

Defendant.

Case No. 2:14-cr-371-JCM-DJA

SEVENTEENTH STIPULATION TO
CONTINUE SENTENCING

The United States of America, through Jason M. Frierson, United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph Giuliano, by and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly move this Honorable Court to vacate the sentencing hearing set for Wednesday, September 7, 2022, at 10:00 a.m. and reset the sentencing proceedings in this matter at a date on or after October 25, 2022.

The parties make this stipulation and motion for good cause and not for the purposes of delay.

The possibility remains that defendant Giuliano may be called to testify in proceedings in a related case or assist in other matters pursuant to his plea agreement. The parties agree that

1 it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best
2 interest to do so.

3 Defendant Giuliano is not in custody and agrees to this continuance.

4 Denial of this request for continuance could result in a miscarriage of justice.

5 This is the fifteenth request to continue sentencing in this matter.

6 The parties respectfully request this Honorable Court issue the attached proposed Order
7 to accomplish these ends.

8 Dated August 29, 2022

9 Counsel for Defendant
10 JOSEPH GIULIANO

JASON M. FRIERSON
United States Attorney

11 //s// Shawn R. Perez
12 SHAWN R. PEREZ, ESQ.
13 Law Offices of Shawn R. Perez
7121 W Craig RD #113-38
Las Vegas, NV 89129
702-485-3977
14 shawn711@msn.com

//s// Daniel J Cowhig
DANIEL J. COWHIG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH GIULIANO,

Defendant.

Case No. 2:14-cr-371-JCM-DJA

ORDER

FINDINGS OF FACT AND CONCLUSIONS OF LAW

Based on the stipulation of the parties and the record in these matters, the Court finds that the parties make this stipulation and motion for good cause and not for the purposes of delay. The possibility remains that defendant Giuliano may be called to testify in proceedings in a related case or in other matters, pursuant to his plea agreement. The parties agree that it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do so.

Defendant Giuliano is not in custody and agrees to this continuance.

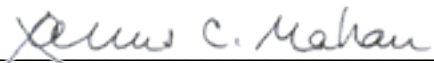
Denial of this request for continuance could result in a miscarriage of justice.

This is the sixteenth request to continue sentencing in this matter.

ORDER

IT IS HEREBY ORDERED, on the stipulation of the parties and good cause appearing therefor, that the sentencing hearing set for Wednesday, September 7, 2022 at 10:00 a.m. be vacated and reset for **October 26, 2022, at 11:00 a.m.** in Las Vegas Courtroom 6A.

IT IS SO ORDERED August 30, 2022.


UNITED STATES DISTRICT JUDGE